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January 30, 2025

VIA ECF ONLY

Honorable Kenneth M. Karas
United States District Judge
The Hon. Charles L. Brieant Jr. Federal Building
United States Courthouse
300 Quarropas Street
White Plains, New York 10601

Re : Fuchs v. LC Carmel Retail LLC, and CVS Pharmacy, Inc.
Case No. : 7:24-cv-04147
PMT File No. : TMB-CVS-00123/AMN

Joint Letter requesting extension of discovery

Dear Judge Karas:

Our office represents CVS in this matter which arises from an accident on a sidewalk adjacent to a CVS Store, leased from co-defendant LC Carmel Retail and located in a shopping plaza. Pursuant to Minute entry for the Telephone Status Conference held on 1/16/2025 at 10:30 a.m. (Document No. 28), the parties were directed to contact Chambers for an extension of the discovery deadlines (Document No. 17).

The minute entry reflects that Defendant LC Carmel Retail still needs to respond to discovery demands from Plaintiff and Defendant CVS. In addition, there is a dispute over an additional deposition of LC Carmel Retail as to the lease provisions, and the parties will be submitting a joint letter, as directed (Document No. 28), on that issue. Therefore, there may be additional depositions of LC Carmel Retail and CVS which will conclude Fact Discovery. In addition, expert disclosures and expert depositions regarding both liability and damages are also outstanding. The liability experts were on site on October 22, 2024.

Therefore, it is respectfully requested that the Court extend the deadline for completion of discovery. The next Case Management Conference is currently scheduled for March 13, 2025 at 10:30 a.m.



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Very truly yours,

PILLINGER MILLER TARALLO, LLP
Attorneys for Defendant CVS

By Anthony M. Napoli

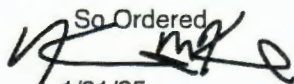
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Attorneys for Defendant LC Carmel Retail

By Joseph Laird

DAVID HOROWITZ, P.C.
Attorneys for Plaintiff Carmen J. Fuchs

By Christopher Jos

Granted. Discovery must be completed by 3/31/25. The
next case management conference will be held 4/22/25,
at 12:00 The pre-motion deadlines are moved accordingly.
No more discovery extensions will be granted.

So Ordered

1/31/25